

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T31—42(A & C))**

The United States Postal Service hereby provides its response to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association redirected from witness Hope: VP/USPS-T31—42(a & c), filed on November 26, 2001.

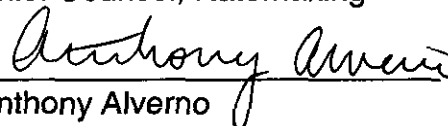
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

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December 18, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.
REDIRECTED FROM WITNESS HOPE**

VP/USPS-T31-42 In your response to VP/USPS-T31-12c, you stated that the ECR parcel rate category "is shape-based, and thus is consistent with the way the Postal Service sorts and delivers mail. Parcels are a separate component of the mail stream; thus, a rate design that recognizes ECR parcels as a separate mail stream, with a distinct rate, is very reasonable and logical."

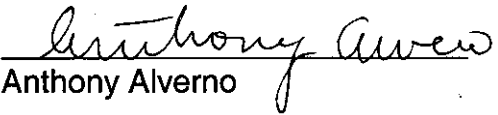
- a. Please describe all differences, and "the way the Postal Service sorts and delivers" ECR parcels, which are between "the way the Postal Service sorts and delivers" ECR flats accompanied by Please describe why ECR flats DALs always accompanied by DALs.
- c. Please describe why ECR flats accompanied by DALs would not also constitute a separate component of the mailstream, similar to ECR parcels, which are always accompanied by DALs.

RESPONSE:

- a. See responses to VP/USPS -T39-8-10, 12, 14, 16, 24, 27, 28, 30, 32, 40-42 redirected to the Postal Service and VP/USPS-2 and 10.
- c. First, it is important to consider the context of the response to VP/USPS-T31-12c, quoted above. In that question, witness Hope was asked whether it made more sense to have an ECR non-letter DAL category than an ECR parcel rate category. Her response thus explained the desirability of why parcels should be treated separately from flats in ECR. Her response does not indicate that flats accompanied by DALs would not also constitute a separate mailstream. To the contrary, her response simply indicates that shape can be a defining characteristic for mail processing and mail classification purposes.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anthony Alverno

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